

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANTHONY ESCOBAR, TONAKIA MOSHA  
EVANS, and DIANNA ABRAMOVA, on behalf of  
themselves, FLSA Collective Plaintiffs and the Class,

Plaintiffs,

v.

PRET A MANGER (USA) LIMITED, and JOHN  
DOE CORPORATIONS 1-100,

Defendants.

No. 17 Civ. 05227 (VSB)

**NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER (1) CONDITIONALLY  
CERTIFYING SETTLEMENT CLASS AND COLLECTIVE ACTION, (2) GRANTING  
PRELIMINARY APPROVAL TO PROPOSED CLASS ACTION SETTLEMENT AND  
PLAN OF ALLOCATION, (3) DIRECTING DISSEMINATION OF NOTICE AND  
RELATED MATERIAL TO THE CLASS, AND (4) SETTING DATE FOR FAIRNESS  
HEARING AND RELATED DATES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for and Order (1) Conditionally Certifying Settlement Class and Collective Action, (2) Granting Preliminary Approval to Proposed Class Action Settlement and Plan of Allocation, (3) Directing Dissemination of Notice and Related Material to the Class, and (4) Setting Date for Fairness Hearing and Related Dates ("Motion for Preliminary Approval"), and the Declaration of C.K. Lee in Support of Plaintiff's Motion for Preliminary Approval ("Lee Declaration"), Plaintiffs respectfully request that the Court enter an Order:

- (1) granting preliminary approval of the Global Settlement Agreement ("Settlement Agreement"), Decl. of C.K. Lee ("Lee Decl.") Ex. A;
- (2) certifying the proposed class for settlement purposes;

- (3) appointing Lee Litigation Group, PLLC (“Lee Litigation Group”) (“Plaintiffs’ Counsel”) as Class Counsel;
- (4) approving the proposed Notice of Class Action Settlement, Ex. B to Settlement Agreement; and
- (5) granting such other, further, or different relief as the Court deems just and proper.

\* \* \*

Plaintiffs have contemporaneously submitted a Proposed Order, attached as Exhibit A to the Settlement Agreement, for the Court’s convenience.

Dated: June 18, 2018  
New York, New York

Respectfully submitted,

By: /s/ C.K. Lee  
Lee Litigation Group, PLLC  
C.K. Lee (CL 4086)  
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***Attorneys for Plaintiffs, FLSA Collective Plaintiffs  
and the Class***